

Exhibit A

The Parties' Proposed Constructions For Terms In Dispute

Exhibit A1: '059 Patent

Exhibit A2: '489 Patent

Exhibit A3: '559 Patent

Exhibit A4: '883 Patent

Exhibit A1: The Parties' Proposed Constructions For Terms In Dispute For The '059 Patent

Term (Patent/Claim)	Plaintiffs' Proposed Construction	Defendants' Proposed Construction
"a sequence number following a sequence number of a last in-sequence acknowledged packet of a transmitter" '059 Patent, claims 1, 3, 8	No further construction necessary	"a Sequence Number of a next expected acknowledged Protocol Data Unit (PDU), meaning the SN following an SN of a last in-sequence acknowledged PDU"
"a sequence number of a next packet to be transmitted for the first time by the transmitter" '059 Patent, claims 1, 3, 8	No further construction necessary	"a Sequence Number of a next Protocol Data Unit (PDU) to be transmitted for a first time (i.e. excluding retransmitted PDUs)"
"status report unit" '059 Patent, claims 1, 2, 3, 4, 8	"a data unit containing status report information"	"a status report comprising at least the sequence number of a PDU"

Exhibit A2: The Parties' Proposed Constructions For Terms In Dispute For The '489 Patent

Term (Patent/Claim)	Plaintiffs' Proposed Construction	Defendants' Proposed Construction
"eNB" '489 Patent, claims 1, 3-12, 14-22	"base station"	"an E-UTRAN base station providing 4G/LTE cellular connectivity to the UE"
"RRCConnectionReconfiguration message" '489 Patent, claims 2, 3, 11, 13, 14, 22	No further construction necessary	"RRCConnectionReconfiguration message as defined in 4G/LTE standard specification TS 36.331-940"
"mobilityControlInfo" '489 Patent, claims 2, 13	No further construction necessary	"mobilityControlInfo as defined in 4G/LTE standard specification TS 36.331-940"

Exhibit A3: The Parties' Proposed Constructions For Terms In Dispute For The '559 Patent

Term (Patent/Claim)	Plaintiffs' Proposed Construction	Defendants' Proposed Construction
<p>“A method for supporting dual connectivity in a wireless communication system, wherein separate eNBs (evolved Node B) are used to support dual connectivity, comprising”</p> <p>'559 Patent, claim 1</p>	<p>Preamble is not limiting.</p> <p>No further construction necessary.</p>	<p>Limiting.</p> <p>“A method for supporting dual connectivity in a wireless communication system, wherein separate eNBs (evolved Node B) are used to support dual connectivity, which is when a UE (User Equipment) is served by both a macro eNB and a small cell eNB, comprising”</p>
<p>“A method for supporting dual connectivity in a wireless communication system, wherein separate eNBs (evolved Node B) are used to support dual connectivity and a UE (User Equipment) is served by a first cell controlled by a first eNB, comprising”</p> <p>'559 Patent, claim 7</p>	<p>Preamble is not limiting.</p> <p>No further construction necessary.</p>	<p>Limiting.</p> <p>“A method for supporting dual connectivity in a wireless communication system, wherein separate eNBs (evolved Node B) are used to support dual connectivity, which is when a UE (User Equipment) is served by both a macro eNB and a small cell eNB, and the UE is served by a first cell controlled by a first eNB, comprising”</p>
<p>“eNBs (evolved Node B)”</p> <p>'559 Patent, claims 1, 7</p>	<p>“base station”</p>	<p>"an E-UTRAN base station providing 4G/LTE cellular connectivity to the UE”</p>
<p>“first eNB”</p> <p>'559 Patent, claims 1, 3, 7, 11</p>	<p>No further construction necessary</p>	<p>"macro eNB”</p>
<p>“second eNB”</p>	<p>No further construction necessary</p>	<p>"small cell eNB”</p>

Term (Patent/Claim)	Plaintiffs' Proposed Construction	Defendants' Proposed Construction
'559 Patent, claims 1, 7, 8		
[Order of Operations] '559 Patent, claims 1, 7	No further construction necessary. There is no order required for the recited method steps.	The steps of claims must be performed in the order listed in the claims.

Exhibit A4: The Parties' Proposed Constructions For Terms In Dispute For The '883 Patent

Term (Patent/Claim)	Plaintiffs' Proposed Construction	Defendants' Proposed Construction
“eNB” and “evolved Node B” ’883 Patent, claims 1, 2, 4-11	“base station”	“an E-UTRAN base station providing 4G/LTE cellular connectivity to the UE”
“first evolved node B (eNB)” / “first eNB” ’883 Patent, claims 1, 5, 6, 7, 9, 11	No further construction necessary	“a first E-UTRAN base station providing 4G/LTE cellular connectivity to the UE”
“second evolved Node B (eNB)” / “second eNB” ’883 Patent, claims 1, 2, 5, 7, 8, 9	No further construction necessary	“a second E-UTRAN base station providing 4G/LTE cellular connectivity to the UE”
“the UE has multiple paths via different eNBs” ’883 Patent, claims 4, 10	No further construction necessary. Not indefinite.	Indefinite.
“Secondary Cell” / “SCell” ’883 Patent, claims 1, 7	No further construction necessary	“‘Secondary Cell’ as defined in 4G/LTE standard specification TS 36.331 v11.2.0”
“Primary Cell” / “PCell” ’883 Patent, claims 1, 7	No further construction necessary	“‘Primary Cell’ as defined in 4G/LTE standard specification TS 36.331 v11.2.0”
“data path for a first radio bearer” ’883 Patent, claims 1, 4, 3, 7, 9, 10	No further construction necessary. Not indefinite.	Indefinite.

Term (Patent/Claim)	Plaintiffs' Proposed Construction	Defendants' Proposed Construction
“data path for a third radio bearer” '883 Patent, claims 1, 7	No further construction necessary. Not indefinite.	Indefinite.
“data path for a second radio bearer” '883 Patent, claims 2, 8	No further construction necessary. Not indefinite.	Indefinite.